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UNITED STATES OF AMERICA

UNITED STATES DISTRICT COURT  
FOR THE CENTRAL DISTRICT OF CALIFORNIA

UNITED STATES OF AMERICA,

Plaintiff,

v.

ALEXANDER SMIRNOV,

Defendant.

No. CR 2:24-cr-00091-ODW

**JOINT PROPOSED STATEMENT OF  
THE CASE**

Trial Date: December 3, 2024  
Trial Time: 9:00 a.m.  
Location: Courtroom of the  
Hon. Otis Wright

The parties— the Plaintiff, United States of America, by and through its counsel of record, and Defendant Alexander Smirnov, by and through his counsel of record— pursuant to the Court’s April 12, 2024 Order Continuing Trial (ECF 65), which

incorporates by reference the parties' joint stipulation (ECF 64) submit their Joint Proposed Statement of the Case for the trial of defendant Alexander Smirnov.

Dated: November 18, 2024

Respectfully submitted,

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/s/

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**JOINT PROPOSED STATEMENT OF THE CASE**

This is a criminal case against the defendant Alexander Smirnov. The indictment returned by the grand jury charges Mr. Smirnov with one count of making a false statement to the FBI, in violation of Title 18 of the United States Criminal Code, Section 1001, and one count of causing the creation of a false record in a federal investigation, in violation of Title 18 of the United States Criminal Code, Section 1519 and 2.

Specifically, the indictment alleges that Mr. Smirnov was a confidential human source with the Federal Bureau of Investigation (“FBI”) and that he provided false derogatory information to the FBI in 2020 about Joseph Biden, who at the time was a candidate for president and had previously been the vice president. The alleged false information concerned Joseph Biden’s and his son Hunter Biden’s involvement with Burisma Holdings Ltd., a Ukrainian energy business. The indictment further alleges that the false information Mr. Smirnov provided to the FBI was memorialized in an official record of the FBI.

Mr. Smirnov has pled not guilty to all of the charges, he denies the allegations, and he is presumed innocent until proven guilty beyond a reasonable doubt.